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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In re Applications of

ERIC R. HILDING

JUDY YEP HUGHES

For Construction Permit for a
New FM Station on Channel 281A
in Windsor, California

) MM DOCKET NO. 93-95

) File No. BPH-911115MR

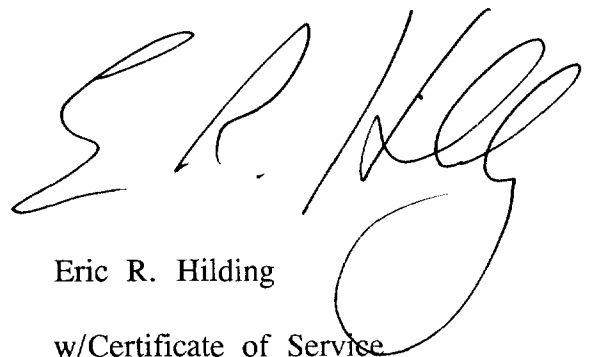
) File No. BPH-911115MT

To: Administrative Law Judge Richard L. Sippel

STANDARDIZED INTEGRATION STATEMENT OF ERIC R. HILDING

Attached is EXHIBIT A, the Standardized Integration Statement of applicant
Eric R. Hilding.

Respectfully submitted,


Eric R. Hilding
w/Certificate of Service

Eric R. Hilding
P.O. Box 1700
Morgan Hill, CA 95038-1700
Tel: (408)778-0900

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Date: May 4, 1993

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FEDERAL COMMUNICATIONS COMMISSION
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EXHIBIT A

INTEGRATION STATEMENT

Eric R. Hilding is an individual applicant with 100% ownership and management control. He propose to work 40 (or more) hours per week at the new FM station in the full-time capacity of General Manager. Mr. Hilding's duties will include, but are not limited to, the following:

1. Overall management of station operations and personnel to include any part-time employees;
2. Short, medium and long-range planning as well as the managing of the financial affairs of the station;
3. Interface with local community organizations in Windsor and the service area;
4. Responsibility for programming direction to include the supervision of music aired on the station;
5. Supervision of station construction activities as well as equipment selection and engineering;
6. Administrative management and supervision of traffic and billing operations and secretarial staff;
7. Responsibility for direction of marketing and sales activities for the new FM station.

In order to accomplish his integration proposal, Hilding will terminate any then current employment activities (whether of a full-time, part-time or other nature), including that or those with any form of mass media, prior to application for program test authority for the new FM station at Windsor, CA.

Eric R. Hilding is a Caucasian male, and believes that the Commission's FCC 301 and integration policies for "minority" and/or "female" status for preferential treatment in selection of best qualified applicant are a violation of his civil rights to equal opportunity as intended by the U.S. Constitution.

Eric R. Hilding is a United States of America citizen and believes that the FCC 301 and integration policies which evoke "local residence" for either community of license and/or service area preferential treatment in the selection of a best qualified applicant are a violation of his civil rights to equal opportunity as intended by the U.S. Constitution, regardless of current U.S. residence before grant of an FCC permit. He does intend to move to Windsor prior to program test authority for the new FM, which may be construed as future residence credit.

As original Channel Petitioner for a new FM allotment at Windsor, California, Eric R. Hilding claims a "Pioneer (or) Channel Petitioner Preference" enhancement for his efforts, time and expense which has resulted in a public service benefit. Hilding may claim "double" such credit as may be applicable.

Eric R. Hilding claims additional Public Service Benefit enhancement credit as the initiator of approximately 15 new FM services allotments within the state of California, many of which resulted in a "first local service" to the public.

Due to certain topographical considerations in the new Windsor FM service area, Eric R. Hilding claims a "Technical Merit" enhancement for the proposed use of a single-bay FM antenna in order to reduce multi-path interference and better serve the public interest. Additional enhancement credit is claimed for the use of compact disc quality music service, as well as any Satellite and/or digital audio delivery vehicles since these have evolved into "best possible service" attribute requirements of any broadcast station in today's "hi-tech" consumer marketplace. Eric R. Hilding claims additional credit for any new technology which may become available and utilized.

Auxiliary Power enhancement credit is claimed for Hilding's proposed use of back-up electrical power generators at both the transmitter and studio locations, in order to insure continuity of programming to the public within Windsor, California, and the entire service area.

Eric R. Hilding claims an enhancement for U.S. Military service in the defense of the United States of America. He also claims enhancement for substantial community and public service (civic) participation in various communities, and that it is a violation of his civil rights and equal protection for the Commission to discriminate between civic involvement in any capacity, whether within a "community of license", "service area" or other locale. "Equal footing" civic participation credit enhancement is claimed regardless of area of service. Since the implied community service preference is allegedly a yardstick of an applicant's past willingness to become an effective interface with the public, discrimination against any applicant by geographical area is at best, an absurdity.

Eric R. Hilding claims multiple broadcast experience preferences to include a "bonus" preference for accumulated "diversity" of broadcast and media experience in a wide variety of positions including management as later described.

Eric R. Hilding was a Cable TV Commissioner appointed by the Morgan Hill City Council from July 1987 through 11/4/92 to include positions as both Chairperson and Vice-Chairperson.

Eric R. Hilding works as an independent program producer and announcer on KSQQ Radio, Morgan Hill, California, with a special nightly program Monday through Friday evenings. He

has done this since January 21, 1991. The program format is Hilding's development, with primary focus being that of airing "positive" oriented program content, another preference sought.

Eric R. Hilding was Sales Manager of KSCO Radio, Santa Cruz, California, from June 15, 1987 until approximately December 28, 1987, when he assumed additional responsibilities as Sales Manager of KLRS-FM, Santa Cruz, CA. He resigned from both stations effective September 30, 1988, and continued on in less than a full-time position until November 22, 1988. The format at KSCO was oldies/MOR; KLRS was New Age/Jazz.

Eric R. Hilding hosted a regular weekend airshift on station KLOK-AM, San Jose, California, from approximately October, 1985, through July 4, 1986. He also did vacation and emergency relief. The format was adult contemporary.

Eric R. Hilding hosted a regular Saturday and Sunday afternoon airshift during the period of approximately March 30, 1985, through September 1, 1985, as well as occasional vacation and emergency replacement airshifts. The format at KBAY was beautiful music. He also broadcast critical major fire info.

Eric R. Hilding was Program Director at KIDD Radio in Monterey, California, from February, 1984 through August, 1984, including management responsibilities. He previously worked a regular weekend airshift from about November, 1983 through early February, 1984. The format at KIDD was adult contemporary.

Eric R. Hilding hosted a regular weekend airshift on KDON-FM Radio, Salinas, California during most of both September and October, 1983. The format @ KDON-FM was CHR/adult contemporary.

Eric R. Hilding assisted the new owners of KWSS (KFAT) Radio, Gilroy, California, during ownership transition by working a two week airshift until the regular new staff arrived. The format was an "odd" variety of music including country.

Eric R. Hilding hosted a two regular weekend airshifts at KNRV Radio, Monterey, California, from about September, 1982 through February or March, 1982. The format at KNRV was oldies, and included various public affairs programs.

Eric R. Hilding was employed as an Account Executive at KTFX Radio, Tulsa, Oklahoma, from November, 1979 through late March or early April of 1980. The format at KTFX was known as "Modern Country".

Eric R. Hilding claims enhancement credit for his various broadcast application engineering work before the Commission, to include his Petition For Reconsideration in MM Docket No. 86-144, which resulted in the revision of Commission rules to benefit Class A station owners and operators by now providing for the use of higher elevation antenna sites to better serve the public. FM Allocation Rules, 3 FCC Rcd 2477 (1988).

Eric R. Hilding claims a credit enhancement for "other media" experience, including TV, print and advertising agency business/broadcast talent experience as described later herein.

Eric R. Hilding also claims an additional, and extremely long overdue, "accommodation" enhancement preference as partial compensation the Commission's failure to act responsibly on his "Petition For Rulemaking To Amend 1965 Policy On Comparative Broadcast Hearings" which has been in excessive "limbo" at the Commission since May, 1985. Arbitrary, Capricious and Abuse

of Agency Discretion at best describe the Commission's failures to take appropriate action. In 1987 the Commission acknowledged to the United States Court of Appeals for the Ninth Circuit, in Eric R. Hilding v. Federal Communications Commission, that said petition was still "pending", and inferred forthwith action. Now, almost six (6) more years have elapsed with no appropriate response from the FCC. Someone should be fired for such gross bureaucratic failures, which has caused applicant substantial emotional and physical hardship resulting from many unnecessary discriminations in broadcast application proceedings during the Commission's almost eight (8) year period of failure to act.

Eric R. Hilding also seeks an additional "accommodation" enhancement preference for the Commission's past discriminatory actions of allowing both "minority" and "female" applicants to be "excused" from failing to comply with application processing requirements for which Hilding was forced to comply. The most classic, of course, was that of allowing a "Black" applicant to late file his Integration/Diversification statement, thereby receiving special "minority" preference in spite of an alleged "hard look" policy of compliance with policies and rules. The Commission ALJ stated essentially "it appears that justice is served by accepting the [black man's] late-filed document [and accordingly shafting Hilding because he is a white boy]". The Commission allowed a "minority female" to be six (6) months deficient in the filing of a required document without penalty, which was additional discrimination against Hilding (who had fully complied with the rules). An accommodation is appropriate since "preferences" (such as auxiliary power) have evolved from the broadcast hearing processes without need for Rulemakings.


Eric R. Hilding finally seeks a supplementary accommodation preference for the additional administrative discrimination to Hilding due to the Commission's failure to take reasonable and prompt action in GC Docket No. 92-52. One inquiry by Hilding to the Commission as to status produced an FCC response that the matter was "one of about 100 items unacted upon which were found in a box underneath the previous FCC Chairman's desk."

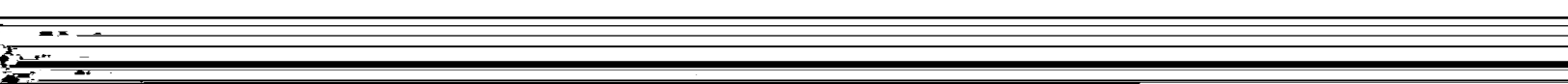
Eric R. Hilding claims in advance, any preferences not presently available or known, to which he may be entitled to as, resulting from these hearing processes or policy changes.

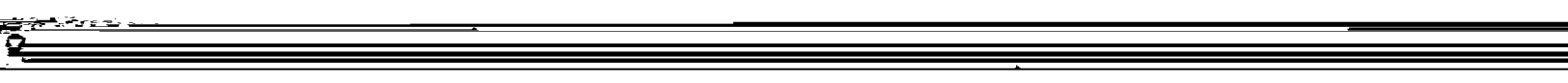
Incorporated herein is a detailed account of experience by Eric R. Hilding pertaining to civic participation and additional broadcasting/related media involvements.


CIVIC ACTIVITIES - Eric R. Hilding

A. Morgan Hill Rotary Club - Mr. Hilding has been a member of Rotary International (Morgan Hill, California Chapter) since February of 1987, a a member of the Board of Directors of the club during the 1989/1990 term. He has perfect attendance of required weekly meetings and/or make-ups, and has volunteered additional time to outside events including six annual weekend









C. Community Law Enforcement Foundation - Mr. Hilding contributed time and effort at six of the organization's annual "Black Tie Auction" fundraisers since 1987.

D. South County Board of Realtors - While employed at Ticor Title Insurance during 1986-1987, Mr. Hilding was a member of this non-profit organization and Co-Chairman of the Education Committee. In addition to attending regular monthly meetings, he had the responsibility for conducting monthly video taped Continuing Education Programs for members.

E. San Benito County Board of Realtors - Also while employed at Ticor Title during 1986-1987, Mr. Hilding was Entertainment Chairman for this non-profit organization's 1986 "Christmas CanTree" food drive project for needy families. In addition to regular board and planning meetings, Mr. Hilding's involvement included securing all of the entertainment.

F. Xerox Social Service Leave Program - Mr. Hilding was honored as one of 30 Xerox employees nationally in 1977 selected to participate in this community service program. As a result of supervising probationary court wards employed at the Xerox parts and supplies center, he spent 10 months working for the County of Santa Clara Juvenile Probation Department on a program called "Project J.O.B." (Juvenile Opportunities in Business). His activities included developing both job and role model type opportunities within other major businesses in Santa Clara County (California). The program involved juvenile offenders within the county. In addition to coordinating activities, raising of gift donations and securing volunteers, Mr. Hilding was responsible for the 1987 Christmas party at one of the Juvenile Hall incarceration hall wings. He had also made

frequent visits to the James Ranch Boys Correctional Facility at Morgan Hill during this project, as well as what was the Muriel Wright Center for Girls. After the Social Service Leave Assignment, Mr. Hilding made material contributions of many self-improvement books and tapes to the James Ranch facility. He assisted in the 1978 Christmas activities and provided some of the entertainment by playing the piano and singing. Mr. Hilding also assisted in an event at the Santa Clara County Children's Shelter and participated in various after-hours events at the County of Santa Clara Juvenile Probation Center.

G. Xerox Community Involvement Program - While on the Xerox Social Service Leave Program, Mr. Hilding remained very involved with the local Xerox Branch XCIP group. As a result, he was instrumental in obtaining XCIP funding and volunteers which provided for the partial refurbishment of an alternative residence home for emotionally disturbed girls, operated by non-profit organization Mental Health Rehabilitation Services. Mr. Hilding donated personal time to the project and made many follow-up visits to serve as a male role model influence at both the girls and boys homes. He frequently provided musical entertainment programs. In 1977 or 1978, Mr. Hilding obtained XCIP permission to fund and host a Thanksgiving Dinner at a treatment facility for mentally ill patients near White and McKee Road(s) in San Jose. He organized the event and also provided musical entertainment.

H. Monterey Bay Girl Scout Council - While employed as Program Director at KIDD Radio, Mr. Hilding contributed personal time for remote broadcast coverage of the Girl Scout's Cookie Mountain Marathon held at the Capitola Mall in Capitola, CA.

I. Muscular Dystrophy Association - Also while in the position of Program Director at KIDD Radio, Mr. Hilding worked closely with MDA's "Radio Love Network" and arranged for other KIDD staff members to contribute time during the 1984 Telethon event broadcast on KNTV-TV in San Jose. Although Mr. Hilding had resigned from KIDD prior to the Labor Day weekend event, he followed through in his commitment and worked an entire shift at the MDA Telethon event. In 1977 or 1978, Mr. Hilding also volunteered time to MDA and was co-host of the outdoor musical entertainment at a San Francisco park. A major San Francisco TV station broadcast the activities throughout the region. Mr. Hilding was also responsible for securing additional people to volunteer as well as musical entertainment for the outdoor concert fundraiser activities. In March, 1989, Mr. Hilding participated in a local MDA "Jail-A-Thon", raising contributions for the organization by telemarketing.

J. Lion's Club "White Cane" Event - In September or October of 1983, MR. Hilding donated personal time to do remote broadcasts for KDON-FM Radio and to assist in sales of beverages at the Lion's Club event location in the Northridge Mall located in Salinas, California.

K. Gilroy Community Theatre - In the fall period of 1982, Mr. Hilding participated in a GCT production of "Wait Until Dark" as an actor and set construction.

L. South Valley Community Theatre - In the fall of 1992, Mr. Hilding was selected for a lead role as "Clifton Feddington" in "The 1940's Radio Hour", and assisted in set construction. He was also responsible for substantial ticket sales through his personal networking and promotion to benefit the theatre.

M. West Valley Amateur Radio Club - Mr. Hilding held the office of Secretary for this organization for one year at approximately age 15, and was a member for several years.. IN July of 1959, he assisted in construction of various antennae on top of the Sainte Claire Hotel in San Jose for the Pacific Division Convention of the American Radio Relay League.

N. Northern California DX Club - From approximately 1961 through the early 1970's, Mr. Hilding was a member of this non-profit amateur radio organization. During one year he was also the Trustee of Club Station W6TI and had the responsibility for the weekly broadcasts of specialized news and information bulletins by morse code. Mr. Hilding attended many annual conventions for this non-profit organization.

O. Northern California Contest Club - Mr. Hilding was a co-founder and charter member of this amateur radio club and remained a member for several years.

P. First Class Operators Club - Mr. Hilding was invited to become a member of this international amateur radio operator organization sometime in the 1960's and remained a member for several years.

Q. Class A Operators Club - Mr. Hilding was invited to become a member of this international amateur radio operator organization sometime in the 1960's, and remained a member for several years.

R. American Radio Relay League - Sometime in the late 1950's or early 1960's, Mr. Hilding became a member of this amateur radio organization and remained a member for 10 years or longer.

S. Public Service via Amateur Radio - Mr. Hilding was first licensed by the FCC in January of 1957. During the years from approximately 1959 through 1964, Mr. Hilding frequently handled "phone patch" traffic over his ham station, enabling American service personnel stationed overseas to talk home with their families. Specific recollections include personnel in Greenland, the Marshall Islands, Okinawa, Guam, Midway and Antarctic bases. Since third party traffic was not allowed between Brazil and the U.S.A., Mr. Hilding obtained special permission from the U.S. State Department which resulted in his being able to help a High School Foreign Exchange Student to speak directly with his father and mother over Mr. Hilding's amateur station on numerous occasions.

T. Odd Fellow-Rebekah Children's Home - In February of 1992, Mr. Hilding served as the volunteer "M.C." for a fundraiser concert held on two separate evenings.

U. Big Brothers/Big Sisters Organization - In the Spring of 1992, Mr. Hilding served as the volunteer "M.C." for this organization's local "Bowl-A-Thon" fundraiser.

V. Reach Out - In the Spring of 1992, Mr. Hilding served as the volunteer "M.C." of this multi-denominational Food Bank charitable fundraising concert event.

W. American Heart Association - In February of 1993, Mr. Hilding served as the volunteer "M.C." /Auctioneer of the AHA's local chapter annual "Celebrity Waiter" fundraiser.

X. Citizen Of The Year Nominee - While attending the 1993 "Citizen of the Year" event in Morgan Hill, Mr. Hilding was surprised to learn that he had also been a nominee.

BROADCASTING/RELATED MEDIA - Eric R. Hilding

A. Satellite Program Network (SPN), A division of Satellite Syndicated Systems - During a period of approximately 3 months from August, 1980 through October, 1980, Mr. Hilding served as an independent contractor/consultant. The specific project involved a test marketing program for merchandising U.S. Sprint telephone system service over Satellite TV. During the project, Mr. Hilding wrote and produced several Direct Response TV commercials which were aired over the network. Responsibilities also involved a feasibility study to determine possibilities of utilizing telemarketing as an auxiliary form of marketing. Mr. Hilding reported directly to the Senior Vice-President of the organization.

B. Greenwood Sales Training Films - In either 1980 or 1981, MR. Hilding was hired to be an actor in several radio sales training video programs for this Tulsa, Oklahoma firm. These programs were utilized by radio stations across the U.S.

C. Radio America (Satellite Systems) - During a several month period from April, 1982 through early July, 1982, on a non-paid consulting basis (with hopes of becoming employed on a full-time basis if the intended project was successful), Mr. Hilding performed various types of work. His contributions included specific market research and the formulation of a computerized model to forecast potential affiliate stations' growth, network advertising sales revenues, average spot rates, network avails projections, expenses and bottom line revenues and profitability potential. Detailed evaluations were done by market size rankings, and projections used in a business plan. The fledgling group was located in Virginia Beach, Virginia.

D. Corporate Times Newspaper - As an independent contractor/consultant, Mr. Hilding was instrumental in the development of the paper's predecessor during the embryonic stages. Mr. Hilding worked directly for the Publisher, and contributed to development of advertising rates structures, layouts and test marketing activities. Between February of 1982 and either late 1982 or 1983, Mr. Hilding wrote, voiced and produced a number of radio commercials for the paper and effectuated barter/trade arrangements with various radio stations including KBAY, KLOK, KHTT, KLIV/KARA (All San Jose), KWSSS (Gilroy), KPEN (KHQT/Los Altos) and KYUU (now KFRC-FM) in San Francisco. Commercials were recorded at KLOK, KHTT/KSJO, KYUU and KWSS.

E. U.S. Army Security Agency - During the period from February, 1966 through January, 1972, Mr. Hilding completed his military service obligation with an Honorable Discharge. During initial training, he was selected as an "Acting Sergeant" in both basic training and Radio Operator's school. Due to his morse code proficiency, Mr. Hilding was selected to participate as an assistant instructor at the Radio Operator's School. He held a Top Secret and Cryptographic clearance with the Agency.

F. Miscellaneous - Mr. Hilding wrote, voiced and also produced several direct response television commercials for two of his own products which were marketed over two satellite TV networks (CBN and SPN) in last 1981 and early 1982. He similarly did commercials for a family product which aired on KNTV-TV (San Jose) and KSBW-TV (Salinas), both in California. Continued test marketing commercials were also done by Hilding

CERTIFICATE OF SERVICE

I, Eric R. Hilding, under penalty of perjury, hereby declare that a copy of this "STANDARDIZED INTEGRATION STATEMENT" has been sent via First